

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

CAROLYN CARRADINE,	)	
	)	
Plaintiff,	)	No.: 08 C 6507
	)	
v.	)	Judge Dow Jr.
	)	
CHICAGO POLICE OFFICER JOSE	)	Magistrate Judge Ashman
CORTES, STAR NO. 18443 and CHICAGO	)	
POLICE OFFICER JOE MARTIN, STAR	)	
NO. 7734, individually and as employee/Agents	)	
of the CITY OF CHICAGO, a municipal	)	
Corporation,	)	JURY DEMAND
	)	
Defendants.	)	

**AGREED MOTION FOR JUDGMENT and DISMISSAL**

Now comes the plaintiff, CAROLYN CARRADINE, by and through her attorneys, JEFFREY J. NESLUND and ROBERT ROBERTSON, and Defendants, CHICAGO POLICE OFFICER JOSE CORTES, STAR NO. 18443 and CHICAGO POLICE OFFICER JOE MARTIN, STAR NO. 7734, by their attorneys, SHNEUR NATHAN of Andrew M. Hale & Associates, LLC, jointly request this Court enter an order for Judgment and dismissal and in support thereof, states as follows:

1. On February 18, 2011, a jury returned a verdict in Plaintiff's favor in the amount of \$250,000.00 on her malicious prosecution claim against Defendant Officer Cortes.
2. On March 19, 2011, Defendant Cortes filed a motion for judgment as a matter of law.
3. On June 1, 2011 Defendant Cortes filed a motion for a new trial pursuant to Rule 60(b)(2) in which he claimed newly discovered evidence.

4. The parties have since entered into settlement negotiations and resolved this matter for \$215,000.00

5. Therefore, the parties request this Court enter an order :

(a.) for judgment to be entered in the amount of \$215,000.00 in favor of Plaintiff in complete and total satisfaction of the judgment previously entered on February 18, 2011; this amount to be paid within 30 days of entry of this order;

(b.) the judgment entered in this case against Chicago Police Officer Jose Cortes is satisfied upon receipt of the \$215,000.00 to Plaintiff and Chicago Police Officer Jose Cortes is hereby released and all claims against all defendants are dismissed with prejudice.

/s/ Jeffrey J. Neslund

Jeffrey J. Neslund  
Attorney for Plaintiff

/s/ Shneur Nathan

Shneur Nathan  
One of the Attorneys for Defendants

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